



Facility Fact Sheet

Rhodia, Inc.
Charleston, Charleston County, South Carolina

Draft Modified Hazardous Waste Permit
Facility ID# SCD 003 358 389

The South Carolina Department of Health and Environmental Control (DHEC) has written a draft modified Hazardous Waste Permit for the Rhodia, Inc. facility, in Charleston, South Carolina.

The draft permit has been written to comply with the South Carolina Hazardous Waste Management Regulations and the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments.

This fact sheet explains DHEC's hazardous waste permitting process and the conditions of the draft permit.

DHEC will hold an informal public meeting to discuss the draft permit with interested citizens. For more information, please refer to Section VI.

I. Hazardous Waste Permitting Process

DHEC regulates hazardous waste activities at permitted facilities in South Carolina.

The permitting process gives DHEC and other government agencies the opportunity to evaluate the ability of a facility to comply with state and federal regulations.

After the Statement of Basis is received and determined to be complete, DHEC writes a draft permit containing all conditions that the facility must meet. The Statement of Basis is an explanation of clean-up activities and protective measures.

Interested citizens are given forty-five (45) days to review and comment on the facility's Statement of Basis and the draft permit before DHEC makes a final decision on the draft permit.

DHEC encourages all interested persons to participate in our permitting process.

II. Facility Description

The Rhodia facility is a manufacturer of a variety of phosphorous-based specialty chemicals. These chemicals can be used in many different products including flame

retardants, lubricant additives, rust inhibitors, water treatment chemicals and pharmaceuticals.

The current site has been used in an industrial capacity since 1894. The site was owned and operated by the Carolinas-Virginia Chemical Corporation (prior to 1963), Mobil Oil Corporation (Exxon-Mobil) from 1963 to 1985 and Albright & Wilson Americas (A&W - 1985 – 2000). Rhodia purchased A&W in 2000.

Initial voluntary environmental investigations began at the facility in 1981. Continued investigations from 1982 to 1988 resulted in areas of the facility being included in the Permit for further sampling and eventual remediation and clean-up.

III. Facility's Hazardous Waste Permit History

The initial hazardous waste Permit for storage and treatment of wastes was applied for and received by Exxon-Mobil on September 30, 1983. Albright and Wilson applied for and received a renewal on September 29, 1989. A subsequent renewal was granted on September 30, 1997. Rhodia, Inc. applied for and was granted a renewal of the Permit on June 16, 2004

IV. Draft Permit Requirements

The draft permit contains conditions for the following:

- 1. The expansion of groundwater extraction and treatment systems.**
- 2. The installation of two groundwater reactive barriers.**
- 3. Isolation and capping of soils and sediments.**

- 4. The implementation of land-use management controls and deed restrictions.**

- 5. Selection of final remedies for corrective action and financial assurance.**

V. Public Participation

The Statement of Basis and draft permit is available for public review and comment from **May 9, 2011 through June 22, 2011.**

DHEC placed a public notice in The State newspaper on May 9, 2011, announcing the beginning of the public comment period.

Written comments must be submitted no later than June 22, 2011, and should be addressed to Mr. Richard Haynes at the following address:

SC DHEC
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
Phone: (803) 896-4070
E-Mail: haynesra@dhec.sc.gov

The draft permit, Statement of Basis and other related information, also known as the Administrative Record, are available for review through **June 22, 2011**, at the following location:

SC DHEC
Bureau of Land and Waste Management
Stern Building, Suite 102
8911 Farrow Road
Columbia, SC 29203

This fact sheet, the public notice, the Statement of Basis and a facility location map, may be viewed on DHEC's Website at :
http://www.scdhec.gov/environment/lwm/public_notice.asp.

VI. Public Meeting

DHEC is holding an **informal public meeting** to discuss the draft permit with interested citizens. The meeting is scheduled for **Wednesday June 22, 2011, at 6:30 p.m.** The meeting will be held at:

**SC DHEC, Region 7 Office
1362 McMillan Avenue, Suite 300
Charleston, SC 29405
(843) 953-0150**

Any individuals with disabilities or special needs who wish to participate in the meeting or review the Administrative Record should contact Ms. Norma West at (803) 896-4056 at least one week in advance to discuss any special aids or services needed.

Anyone who would like to be placed on the facility mailing list to receive notification of future public meetings or notices by DHEC's Division of Waste Management should submit a written request to the attention of Ms. Norma West at:

**SC DHEC
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
E-Mail: westnj@dhec.sc.gov**

VII. Procedure for Reaching a Final Permit Decision

All written comments received by **June 22, 2011**, will be considered before a final decision is made on the draft permit.

Once DHEC makes its final decision, notification will be provided to:

- The facility;
- Each person who submitted written comments; and
- Anyone who has requested to receive notice of the final decision.

Any affected person who wishes to appeal a DHEC final decision may do so by filing a written request for final review with DHEC's Clerk of the Board within fifteen (15) days after notice of the decision has been mailed.

Additional information regarding appeal procedures is available from DHEC's Clerk of the Board at the above DHEC address or by calling (803) 898-3309.

VIII. Brief Summary of the Draft Hazardous Waste Permit Conditions

The draft hazardous waste permit is divided into modules. Each module and a brief explanation of the permit conditions are listed in the table below. The regulation that governs the condition(s) is also listed.

Module I	Standard Conditions	This section defines and contains standard administrative conditions that apply to all hazardous waste management facilities. <i>(R.61-79.270.30)</i>
Module II	General Facility Conditions	Conditions apply to all facilities that treat, store or dispose of hazardous waste. <i>(R.61-79.264)</i>
Module III	Containers	Conditions apply to the use and management of containers for storage at the facility. It also contains general information regarding the design, operation, and maintenance of the storage area of the facility, along with schedules and required documents that must be maintained by the facility. <i>(R.61-79.264.170)</i>
Module IV	Tanks	Conditions apply to the use and management of tanks for storage at the facility. It also contains general information regarding the design, operation, and maintenance of the storage area of the facility, along with schedules and required documents that must be maintained by the facility. <i>(R.61-79.264.190)</i>
Module V	Reactive Waste Treatment Unit and Containment Area	Conditions apply to the use and management of a treatment area for reactive hazardous wastes. <i>(R.61-79.264.190)</i>
Module VI	Corrective Action for Solid Waste Management Units & Areas of Concern	<p>This section requires the facility to implement corrective action measures, when necessary. <i>(R.61-79.264)</i></p> <p>The objective of the corrective action program at a hazardous waste management facility is to evaluate the nature and extent of releases of hazardous waste and/or constituents and, if necessary, to put corrective measures in place that will protect human health and the environment.</p>

Module VII	Organic air Emission Requirements for Process Vents and Equipment Leaks	Conditions for the inspection of tanks, containers and process equipment that handle organic hazardous wastes to prevent the release of vapors or other emissions. <i>(R.61-79.264 Subpart BB and CC)</i>
Module VIII	Waste Minimization	<p>Conditions require that the facility has a program in place to reduce the volume and toxicity of hazardous waste generated and that the treatment, storage or disposal method minimizes present and future threat to human health and the environment.</p> <p><i>These conditions are governed by Section 44-56-170(A) of the 1976 South Carolina Code of Laws, as amended.</i></p>
Module IX	Land Disposal Restrictions	Conditions ensure that restricted waste is not disposed of in a land-based unit or otherwise managed unless certain requirements are met. <i>(R.61-79.268)</i>

Additional information can be found in the draft permit and the facility's permit application.